



## **PART 70**

# **PERMIT TO OPERATE**

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

**Operating Permit Number:**

**Expiration Date:**

**Installation ID:** 099-0011

**Project Number:** 2003-05-126

**Installation Name and Address**

Union Pacific Railroad Company – DeSoto Car Shop  
491 N. Main  
DeSoto, MO 63020  
Jefferson County

**Parent Company's Name and Address**

Union Pacific Railroad Company  
491 N. Main  
DeSoto, MO 63020

**Installation Description:**

Union Pacific Railroad Company - De Soto Car Shop operates a railroad car repair and painting facility in De Soto Missouri. The installation consists of painting operations, drying ovens, shot blast-cleaning operations, and parts washing. The installation has the potential to emit particulate matter less than ten microns in diameter (PM<sub>10</sub>), volatile organic compounds (VOC) and hazardous air pollutants (HAP) above the Title V major threshold levels.

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Effective Date

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Director or Designee

Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

#### Installation Description:

Union Pacific Railroad Company - De Soto Car Shop operates a railroad car repair and painting facility in De Soto Missouri. The installation consists of painting operations, drying ovens, shot blast-cleaning operations, and parts washing. The installation has the potential to emit particulate matter less than ten microns in diameter (PM<sub>10</sub>), volatile organic compounds (VOC) and hazardous air pollutants (HAP) above the Title V major threshold levels.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2005	0.79	0.01	1.81	17.54	0.33	--	--
2004	0.86	0.01	1.71	24.78	0.31	--	--
2003	0.36	0.01	1.94	14.86	0.34	--	--
2002	0.76	0.01	2.16	10.38	0.20	--	1.22
2001	0.22	0.01	2.00	9.57	0.08	--	1.22

### EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and which is identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit	EIQ Emission Point No. (2002)
EU0010	Shot Blast #1	EP-4
EU0020	Shot Blast #2	EP-6
EU0030	Shot Blast #3	EP-15
EU0040	Old Painting Booth	EP-7
EU0050	Drying Oven	EP-9
EU0060	Old Swab Painting	EP-8
EU0070	New Swab Painting	EP-20
EU0080	Old Stencil Position	EP-10
EU0090	New Paint Booth	EP-11
EU0100	New Drying Oven	EP-12
EU0110	New Stencil Position	EP-13
EU0120	North End Paint Booth	EP-17
EU0130	120-Gallon Parts Washer	EP-19
EU0140	5-Gallon Parts Washer	EP-19

### EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment which does not have unit specific limitations at the time of permit issuance.

<b>Description of Emission Source</b>	<b>EIQ Emission Point No. (2002)</b>
Black Smith Forge (natural gas, 2.9 MMBtu/hr)	EP-1
1000-gallon Diesel Fuel Storage Tank	EP-2
Unpaved Road (fugitive)	EP-5
Space Heaters (natural gas, individual units < 10 MMBtu)	EP-14
New Space Heaters (natural gas, individual units < 10 MMBtu)	EP-16
Welding (fugitive)	EP-18
Wood Mill/ Maintenance Shop	EP-21
350-gallon Gasoline Storage Tank	EP-22
350-gallon Waste Oil Storage Tank	EP-23
275-gallon Waste Oil Storage Tank	EP-24
275-gallon Kerosene Storage Tank	EP-25

#### **DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit.

1. APCP Construction Permit # 0795-014, effective date July 22, 1995
2. APCP Construction Permit # 112000-004, effective date October 16, 2000

Draft

## II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

### Permit Condition PW001 10 CSR 10-6.060

#### Construction Permits Required

APCP Construction Permit # 0795-014

#### Emission Limitation:

If in the opinion of the Director, a continuing situation of demonstrated nuisance odors exists for the neighbors of the facility, the Director may require the permittee to submit a corrective action plan adequate to timely and significantly mitigate the odors. The permittee shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be a violation of the permit. [\[Special Condition 9\]](#)

#### Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO, 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

### Permit Condition PW002 10 CSR 10-6.065

#### Operating Permits Required

Voluntary Limitation

#### Emission Limitation:

The permittee shall not emit more than 9.4 tons of any single Hazardous Air Pollutant (HAP) and/or 24.4 tons of combined HAPs in any consecutive 12-month period.

#### Monitoring:

The permittee shall monitor the amount and type of HAP containing materials used at the installation.

#### Recordkeeping:

1. The permittee shall record the monthly total of individual and combined HAP emissions and the sum of the most recent consecutive twelve-month totals in tons from this installation. (See Attachments B and C)
2. These records shall be kept on-site for five years and shall be made immediately available for inspection to the Department of Natural Resources' personnel upon request.

#### Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO, 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

### III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

#### EU0010 Shot Blast #1

General Description:	Abrasive blasting of metal parts with slag abrasives; MHDR: 0.65 ton/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed: 1965
Manufacturer/Model #:	N/A
EIQ Reference # (2002):	EP-4

#### Permit Condition EU0010-001

##### 10 CSR 10-6.220

##### Restriction of Emissions of Visible Air Contaminants

###### Emission Limit:

1. No owner or other person shall cause or permit to be discharged into the atmosphere from any existing source any visible emissions with an opacity greater than 20%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with an opacity up to 40%.

###### Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in USEPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow.
2. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
3. The following monitoring schedule must be maintained:
  - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then;
  - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then;
  - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
4. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

###### Recordkeeping:

1. The permittee shall maintain records of all observation results (see Attachment D), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and
  - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain a record of any equipment malfunctions (see Attachment F).
3. The permittee shall maintain records of any USEPA Method 9 opacity test performed in accordance with this permit condition (see Attachment E).

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

**Permit Condition EU0010-002**

**10 CSR 10-6.400**

**Restriction of Emission of Particulate Matter from Industrial Processes**

**Emission Limit:**

1. The permittee shall not emit particulate matter in excess of 3.07 lb/hr. The emission rate was calculated using the following equation:
  - a) For process weight rates of 60,000 lb/hr or less:  
$$E = 4.10(P)^{0.67}$$

Where:  
E = rate of emission in lb/hr  
P = process weight rate in ton/hr
2. The permittee shall not emit particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic feet of exhaust gases.

**Monitoring:**

1. The shot blast shall not be operated without a fabric filter in place.
2. Fabric filters shall be inspected for holes, imperfections, proper installation, or other problems that could hinder the effectiveness of the filter.
3. The filters shall be inspected each shift before blasting begins and after installation of a new filter.
4. The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

**Recordkeeping:**

1. The permittee shall maintain records of the inspections of fabric filters when they occur.
2. All inspections, corrective actions, and instrument calibrations shall be recorded.
3. Attachment F contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this permit condition.
4. All records shall be kept on-site for a minimum of five years and made available to Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

**EU0020 Shot Blast #2**

General Description:	Abrasive blasting of metal parts with slag abrasives; MHDR: 0.33 ton/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed: 1978
Manufacturer/Model #:	N/A
EIQ Reference # (2002):	EP-6



## Permit Condition EU0020-001

### 10 CSR 10-6.220

#### Restriction of Emissions of Visible Air Contaminants

##### Emission Limit:

1. No owner or other person shall cause or permit to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with an opacity up to 40%.

##### Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in USEPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow.
2. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
3. The following monitoring schedule must be maintained:
  - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
  - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then:
  - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
4. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

##### Recordkeeping:

1. The permittee shall maintain records of all observation results (see Attachment D), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and
  - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain a record of any equipment malfunctions (see Attachment F).
3. The permittee shall maintain records of any USEPA Method 9 opacity test performed in accordance with this permit condition (see Attachment E).

##### Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

## Permit Condition EU0020-002

### 10 CSR 10-6.400

#### Restriction of Emission of Particulate Matter from Industrial Processes

##### Emission Limit:

1. The permittee shall not emit particulate matter in excess of 1.95 lb/hr. The emission rate was calculated using the following equation:
  - a) For process weight rates of 60,000 lb/hr or less:
$$E = 4.10(P)^{0.67}$$
Where:  
E = rate of emission in lb/hr  
P = process weight rate in ton/hr

- The permittee shall not emit particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic feet of exhaust gases.

**Monitoring:**

- The shot blast shall not be operated without a fabric filter in place.
- Fabric filters shall be inspected for holes, imperfections, proper installation, or other problems that could hinder the effectiveness of the filter.
- The filters shall be inspected each shift before blasting begins and after installation of a new filter.
- The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

**Recordkeeping:**

- The permittee shall maintain records of the inspections of fabric filters when they occur.
- All inspections, corrective actions, and instrument calibrations shall be recorded.
- Attachment F contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this permit condition.
- All records shall be kept on-site for a minimum of five years and made available to Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

**EU0030 Shot Blast #3**

General Description:	Abrasive blasting of metal parts with slag abrasives; MHDR: 8.92 ton/hr; Dust collector: capture efficiency 100%, control device efficiency 99.4%; Installed: 1995
Manufacturer/Model #:	BCP
EIQ Reference # (2002):	EP-15

**Permit Condition EU0030-001**

**10 CSR 10-6.220**

**Restriction of Emissions of Visible Air Contaminants**

**Emission Limit:**

- No owner or other person shall cause or permit to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
- Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with an opacity up to 40%.

**Monitoring:**

- The permittee shall conduct opacity readings on this emission unit using the procedures contained in USEPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow.
- If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- The following monitoring schedule must be maintained:

- a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then;
  - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then;
  - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
4. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Recordkeeping:**

1. The permittee shall maintain records of all observation results (see Attachment D), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and
  - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain a record of any equipment malfunctions (see Attachment F).
3. The permittee shall maintain records of any USEPA Method 9 opacity test performed in accordance with this permit condition (see Attachment E).

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

**Permit Condition EU0030-002**

**10 CSR 10-6.060**

**Construction Permits Required**

APCP Construction Permit # 0795-014

**10 CSR 10-6.400**

**Restriction of Emission of Particulate Matter from Industrial Processes**

**Emission Limit:**

1. The permittee shall not emit particulate matter in excess of 17.76 lb/hr. The emission rate was calculated using the following equation:
  - a) For process weight rates of 60,000 lb/hr or less:
$$E = 4.10(P)^{0.67}$$
Where:  
E = rate of emission in lb/hr  
P = process weight rate in ton/hr
2. The permittee shall not emit particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic feet of exhaust gases.
3. The particulate control and removal system shall be designed to remove at least 99.4 % of the particulate matter less than ten microns (PM<sub>10</sub>) in the exhaust air stream. [\[Permit # 0795-014, Special Condition 1\]](#)

**Monitoring:**

1. The shot blast shall not be operated without a fabric filter in place.
2. Fabric filters shall be inspected for holes, imperfections, proper installation, or other problems that could hinder the effectiveness of the filter.
3. The filters shall be inspected each shift before blasting begins and after installation of a new filter.
4. The permittee shall operate the particulate control system according to the manufacturer's recommendations at all times when the shot blast is in operation. The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters including the stocking of adequate replacement parts. [\[Permit # 0795-014, Special Condition 4\]](#)

**Recordkeeping:**

1. The permittee shall maintain records of the inspections of fabric filters when they occur.
2. All inspections, corrective actions, and instrument calibrations shall be recorded.
3. Attachment F contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this permit condition.
4. All records shall be kept on-site for a minimum of five years and made available to Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

**EU0040 & EU0050 - Old Paint Booth and Drying Oven**

General Description:	EU0040	Painting operation; MHDR: 26.42 gallons/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed 1965
	EU0050	Direct fired drying oven; Fuel: natural gas; MHDR: 3.24 MMBtu/hr; Retrofitted: 2000
Manufacturer/Model #:	EU0040	N/A
	EU0050	N/A
EIQ Reference # (2002):	EU0040	EP-7
	EU0050	EP-9

**Permit Condition (EU0040 & EU0050)-001**

**10 CSR 10-5.330**

**Control of Emissions from Industrial Surface Coating Operations**

**Emission Limit:**

The permittee shall not apply any coating with VOC content in excess of 3.5 lb VOC per gallon of coating (less water and non-VOC organic compounds).

**Monitoring:**

1. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or from data determined by an analysis of each coating, as received, by EPA Reference Method 24.
2. The permittee shall use the following procedures for determining the daily volume-weighted average (DAVG<sub>VW</sub>) pounds of VOC emitted per gallon of coating (minus water and non-VOC organic compounds):
  - a) Calculate the DAVG<sub>VW</sub> of all coatings used as delivered to the coating applicator(s) using the following formula:

$$DAVG_{VW} = \frac{\sum_{i=1}^n (A_i \times B_i)}{C}$$

Where:

A = daily gal each coating used (minus water and exempt solvents) in a surface coating operation;

B = lbs VOC/gal coating (minus water and exempt solvents);

C = total daily gal coatings used (minus water and exempt solvents) in a surface coating operation; and

n = number of coatings used in a surface coating operation.

3. If the daily volume-weighted average ( $DAVG_{vw}$ ) is less than 3.5 lb VOC per gallon of coating (less water and non-VOC organic compounds), the source is in compliance.

**Recordkeeping:**

1. The permittee shall keep records detailing specific VOC sources, as necessary to determine compliance. These may include (see Attachment G):
  - a) Daily records of the type and the quantity of coatings used daily;
  - b) The coatings manufacturer's formulation data for each coating in forms provide or approved by the director;
  - c) Daily records of the type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
  - d) All test results to determine capture and control efficiencies, transfer efficiencies and coating makeup;
  - e) Daily records of the type and quantity of waste solvents reclaimed or discarded daily;
  - f) Daily records of the quantity of pieces of materials coated daily; and
  - g) Any additional information pertinent to determine compliance.
2. All records shall be maintained for a minimum of five years.
3. These records shall be made available immediately for inspection to the Air Pollution Control Section of the Department of Natural Resources personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

**Permit Condition EU0040-002**

**10 CSR 10-6.220**

**Restriction of Emissions of Visible Air Contaminants**

**Emission Limit:**

1. No owner or other person shall cause or permit to be discharged into the atmosphere from any existing source any visible emissions with an opacity greater than 20%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with an opacity up to 40%.

**Monitoring:**

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in USEPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow.
2. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
3. The following monitoring schedule must be maintained:
  - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then;
  - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then;
  - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
4. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Recordkeeping:**

1. The permittee shall maintain records of all observation results (see Attachment D), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and
  - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain a record of any equipment malfunctions (see Attachment F).
3. The permittee shall maintain records of any USEPA Method 9 opacity test performed in accordance with this permit condition (see Attachment E).

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

**Permit Condition EU0040-003**

**10 CSR 10-6.400**

**Restriction of Emission of Particulate Matter from Industrial Processes**

**Emission Limit:**

1. The permittee shall not emit particulate matter in excess of 1.03 lb/hr. The emission rate was calculated using the following equation:
  - a) For process weight rates of 60,000 lb/hr or less:  
$$E = 4.10(P)^{0.67}$$

Where:  
E = rate of emission in lb/hr  
P = process weight rate in ton/hr
2. The permittee shall not emit particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic feet of exhaust gases.

**Monitoring:**

1. The paint booth shall not be operated without a fabric filter in place.
2. Fabric filters shall be inspected for holes, imperfections, proper installation, or other problems that could hinder the effectiveness of the filter.
3. The filters shall be inspected each shift before blasting begins and after installation of a new filter.
4. The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

**Recordkeeping:**

1. The permittee shall maintain records of the inspections of fabric filters when they occur.
2. All inspections, corrective actions, and instrument calibrations shall be recorded.
3. Attachment F contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this permit condition.
4. All records shall be kept on-site for a minimum of five years and made available to Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

### Permit Condition EU0050-002

#### 10 CSR 10-6.060

##### Construction Permits Required

APCP Construction Permit # 112000-004

##### Operation Limitation:

No fuels other than natural gas shall be combusted in the drying oven at any time of operation. [Special Condition 1]

##### Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

### EU0060 & EU0070 - Old Swab Painting and New Swab Painting

General Description:	EU0060 EU0070	Manual swab painting Manual swab painting
Manufacturer/Model #:	EU0060 EU0070	N/A N/A
EIQ Reference # (2002):	EU0060 EU0070	EP-8 EP-20

### Permit Condition (EU0060 & EU0070)-001

#### 10 CSR 10-5.330

##### Control of Emissions from Industrial Surface Coating Operations

##### Emission Limit:

The permittee shall not apply any coating with VOC content in excess of 3.5 lb VOC per gallon of coating (less water and non-VOC organic compounds).

##### Monitoring:

- The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or from data determined by an analysis of each coating, as received, by EPA Reference Method 24.
- The permittee shall use the following procedures for determining the daily volume-weighted average (DAVG<sub>VW</sub>) pounds of VOC emitted per gallon of coating (minus water and non-VOC organic compounds):
  - Calculate the DAVG<sub>VW</sub> of all coatings used as delivered to the coating applicator(s) using the following formula:

$$DAVG_{VW} = \frac{\sum_{i=1}^n (A_i \times B_i)}{C}$$

Where:

A = daily gal each coating used (minus water and exempt solvents) in a surface coating operation;

B = lbs VOC/gal coating (minus water and exempt solvents);

C = total daily gal coatings used (minus water and exempt solvents) in a surface coating operation; and

n = number of coatings used in a surface coating operation.

- If the daily volume-weighted average (DAVG<sub>VW</sub>) is less than 3.5 lb VOC per gallon of coating (less water and non-VOC organic compounds), the source is in compliance.

**Recordkeeping:**

1. The permittee shall keep records detailing specific VOC sources, as necessary to determine compliance. These may include (see Attachment G):
  - a) Daily records of the type and the quantity of coatings used daily;
  - b) The coatings manufacturer's formulation data for each coating in forms provide or approved by the director;
  - c) Daily records of the type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
  - d) All test results to determine capture and control efficiencies, transfer efficiencies and coating makeup;
  - e) Daily records of the type and quantity of waste solvents reclaimed or discarded daily;
  - f) Daily records of the quantity of pieces of materials coated daily; and
  - g) Any additional information pertinent to determine compliance.
2. All records shall be maintained for a minimum of five years.
3. These records shall be made available immediately for inspection to the Air Pollution Control Section of the Department of Natural Resources personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

**EU0080 Old Stencil Position**

General Description:	Painting process which involves painting identification numbers on railcars; Spray guns as well as non-spray applications and plastic stick-ons are used; Emissions are fugitive; MHD:R: 4 gal/hr; Installed: 1965
Manufacturer/Model #:	N/A
EIQ Reference # (2002):	EP-10

**Permit Condition EU0080-001**

**10 CSR 10-5.330**

**Control of Emissions from Industrial Surface Coating Operations**

**Emission Limit:**

The permittee shall not apply any coating with VOC content in excess of 3.5 lb VOC per gallon of coating (less water and non-VOC organic compounds).

**Monitoring:**

1. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or from data determined by an analysis of each coating, as received, by EPA Reference Method 24.
2. The permittee shall use the following procedures for determining the daily volume-weighted average (DAVG<sub>VW</sub>) pounds of VOC emitted per gallon of coating (minus water and non-VOC organic compounds):
  - a) Calculate the DAVG<sub>VW</sub> of all coatings used as delivered to the coating applicator(s) using the following formula:



$$DAVG_{vw} = \frac{\sum_{i=1}^n (A_i \times B_i)}{C}$$

Where:

A = daily gal each coating used (minus water and exempt solvents) in a surface coating operation;

B = lbs VOC/gal coating (minus water and exempt solvents);

C = total daily gal coatings used (minus water and exempt solvents) in a surface coating operation; and

n = number of coatings used in a surface coating operation.

3. If the daily volume-weighted average ( $DAVG_{vw}$ ) is less than 3.5 lb VOC per gallon of coating (less water and non-VOC organic compounds), the source is in compliance.

**Recordkeeping:**

1. The permittee shall keep records detailing specific VOC sources, as necessary to determine compliance. These may include (see Attachment G):
  - a) Daily records of the type and the quantity of coatings used daily;
  - b) The coatings manufacturer's formulation data for each coating in forms provide or approved by the director;
  - c) Daily records of the type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
  - d) All test results to determine capture and control efficiencies, transfer efficiencies and coating makeup;
  - e) Daily records of the type and quantity of waste solvents reclaimed or discarded daily;
  - f) Daily records of the quantity of pieces of materials coated daily; and
  - g) Any additional information pertinent to determine compliance.
2. All records shall be maintained for a minimum of five years.
3. These records shall be made available immediately for inspection to the Air Pollution Control Section of the Department of Natural Resources personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

**EU0090 through EU0110**

New Paint Booth  
New Drying Oven  
New Stencil Position

General Description:	EU0090	Painting operation; MHDR: 26.42 gallons/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed 1996
	EU0100	Direct fired drying oven; Fuel: pipeline grade natural gas; MHDR 4.16 MMBtu/hr; Installed 1996
	EU0110	Manual stenciling process involves painting identification numbers on railcars; Spray gun as well as non-spray applications and plastic stick-ons are used; Emissions are fugitive; MHDR 4 gal/hr; Installed 1996
Manufacturer/Model #:	EU0090	N/A
	EU0100	N/A
	EU0110	N/A
EIQ Reference # (2002):	EU0090	EP-11
	EU0100	EP-12
	EU0110	EP-13

**Permit Condition (EU0090 through EU0110)-001**

**10 CSR 10-6.060**

**Construction Permits Required**

APCP Construction Permit # 0795-014

**Emission Limit:**

The permittee shall limit the emissions of VOC from the paints, thinners and solvents used with EU0090 through EU0110 to no more than 39.7 tons during any consecutive 12-month period. [\[Special Condition 5\]](#)

**Monitoring/ Recordkeeping:**

- For each calendar month, the permittee shall keep records, using Attachment H or an equivalent form, for each type of paint, thinner or cleanup solvent used: [\[Special Condition 6.a\]](#)
  - Amount used (gallons)
  - Density (lb/gal)
  - VOC content (lb/gal)
  - VOC content (weight %)
  - VOC emission (tons)
- For each calendar month, the permittee shall summarize VOC emissions by adding the VOC emissions determined through recordkeeping for each paint, thinner and cleanup solvent used with EU0090 through EU0110. The emissions of VOC for each calendar month shall be added to the total VOC emitted during the previous consecutive eleven (11) months, using Attachment I or equivalent, to determine VOC emissions for the consecutive 12-month period. [\[Special Condition 6.b and 6.c\]](#)
- All records shall be maintained for a minimum of five years. These records shall be made available immediately for inspection to the Air Pollution Control Section of the Department of Natural Resources personnel upon request. [\[Special Condition 7\]](#)

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation. [Special Condition 8]

**Permit Condition (EU0090 through EU0110)-002**

**10 CSR 10-5.330**

**Control of Emissions from Industrial Surface Coating Operations**

**Emission Limit:**

The permittee shall not apply any coating with VOC content in excess of 3.5 lb VOC per gallon of coating (less water and non-VOC organic compounds).

**Monitoring:**

1. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or from data determined by an analysis of each coating, as received, by EPA Reference Method 24.
2. The permittee shall use the following procedures for determining the daily volume-weighted average (DAVG<sub>VW</sub>) pounds of VOC emitted per gallon of coating (minus water and non-VOC organic compounds):
  - a) Calculate the DAVG<sub>VW</sub> of all coatings used as delivered to the coating applicator(s) using the following formula:

$$DAVG_{VW} = \frac{\sum_{i=1}^n (A_i \times B_i)}{C}$$

Where:

A = daily gal each coating used (minus water and exempt solvents) in a surface coating operation;

B = lbs VOC/gal coating (minus water and exempt solvents);

C = total daily gal coatings used (minus water and exempt solvents) in a surface coating operation; and

n = number of coatings used in a surface coating operation.

3. If the daily volume-weighted average (DAVG<sub>VW</sub>) is less than 3.5 lb VOC per gallon of coating (less water and non-VOC organic compounds), the source is in compliance.

**Recordkeeping:**

1. The permittee shall keep records detailing specific VOC sources, as necessary to determine compliance. These may include (see Attachment G):
  - a) Daily records of the type and the quantity of coatings used daily;
  - b) The coatings manufacturer's formulation data for each coating in forms provide or approved by the director;
  - c) Daily records of the type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
  - d) All test results to determine capture and control efficiencies, transfer efficiencies and coating makeup;
  - e) Daily records of the type and quantity of waste solvents reclaimed or discarded daily;
  - f) Daily records of the quantity of pieces of materials coated daily; and
  - g) Any additional information pertinent to determine compliance.
2. All records shall be maintained for a minimum of five years.
3. These records shall be made available immediately for inspection to the Air Pollution Control Section of the Department of Natural Resources personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

**Permit Condition (EU0090)-003**

**10 CSR 10-6.220**

**Restriction of Emissions of Visible Air Contaminants**

**Emission Limit:**

1. No owner or other person shall cause or permit to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with an opacity up to 40%.

**Monitoring:**

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in USEPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow.
2. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
3. The following monitoring schedule must be maintained:
  - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then;
  - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then;
  - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
4. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Recordkeeping:**

1. The permittee shall maintain records of all observation results (see Attachment D), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and
  - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain a record of any equipment malfunctions (see Attachment F).
3. The permittee shall maintain records of any USEPA Method 9 opacity test performed in accordance with this permit condition (see Attachment E).

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

**Permit Condition (EU0090)-004**

**10 CSR 10-6.060**

**Construction Permits Required**

APCP Construction Permit # 0795-014

**10 CSR 10-6.400**

**Restriction of Emission of Particulate Matter from Industrial Processes**

**Emission Limit:**

1. The permittee shall not emit particulate matter in excess of 1.03 lb/hr. The emission rate was calculated using the following equation:
  - a) For process weight rates of 60,000 lb/hr or less:  
 $E = 4.10(P)^{0.67}$   
Where:  
E = rate of emission in lb/hr  
P = process weight rate in ton/hr
2. The permittee shall not emit particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic feet of exhaust gases.
3. The particulate control and removal system shall be designed to remove at least 95 % of the particulate matter less than ten microns (PM<sub>10</sub>) in the exhaust air stream. [\[Permit # 0795-014, Special Condition 2\]](#)

**Monitoring:**

1. The paint booth shall not be operated without a fabric filter in place.
2. Fabric filters shall be inspected for holes, imperfections, proper installation, or other problems that could hinder the effectiveness of the filter.
3. The filters shall be inspected each shift before blasting begins and after installation of a new filter.
4. The permittee shall operate the particulate control system according to the manufacturer's recommendations at all times when the paint booth is in operation. The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters including the stocking of adequate replacement parts. [\[Permit # 0795-014, Special Condition 4\]](#)

**Recordkeeping:**

1. The permittee shall maintain records of the inspections of fabric filters when they occur.
2. All inspections, corrective actions, and instrument calibrations shall be recorded.
3. Attachment F contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this permit condition.
4. All records shall be kept on-site for a minimum of five years and made available to Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

**EU0120 North End Paint Booth**

General Description:	Painting operation; MHDR: 4.40 gallons/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed 1995
Manufacturer/Model #:	N/A
EIQ Reference # (2002):	EP-17

## Permit Condition EU0120-001

### 10 CSR 10-5.330

#### Control of Emissions from Industrial Surface Coating Operations

##### Emission Limit:

The permittee shall not apply any coating with VOC content in excess of 3.5 lb VOC per gallon of coating (less water and non-VOC organic compounds).

##### Monitoring:

1. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or from data determined by an analysis of each coating, as received, by EPA Reference Method 24.
2. The permittee shall use the following procedures for determining the daily volume-weighted average (DAVG<sub>VW</sub>) pounds of VOC emitted per gallon of coating (minus water and non-VOC organic compounds):
  - a) Calculate the DAVG<sub>VW</sub> of all coatings used as delivered to the coating applicator(s) using the following formula:

$$DAVG_{VW} = \frac{\sum_{i=1}^n (A_i \times B_i)}{C}$$

Where:

A = daily gal each coating used (minus water and exempt solvents) in a surface coating operation;

B = lbs VOC/gal coating (minus water and exempt solvents);

C = total daily gal coatings used (minus water and exempt solvents) in a surface coating operation; and

n = number of coatings used in a surface coating operation.

3. If the daily volume-weighted average (DAVG<sub>VW</sub>) is less than 3.5 lb VOC per gallon of coating (less water and non-VOC organic compounds), the source is in compliance.

##### Recordkeeping:

1. The permittee shall keep records detailing specific VOC sources, as necessary to determine compliance. These may include (see Attachment G):
  - a) Daily records of the type and the quantity of coatings used daily;
  - b) The coatings manufacturer's formulation data for each coating in forms provide or approved by the director;
  - c) Daily records of the type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
  - d) All test results to determine capture and control efficiencies, transfer efficiencies and coating makeup;
  - e) Daily records of the type and quantity of waste solvents reclaimed or discarded daily;
  - f) Daily records of the quantity of pieces of materials coated daily; and
  - g) Any additional information pertinent to determine compliance.
2. All records shall be maintained for a minimum of five years.
3. These records shall be made available immediately for inspection to the Air Pollution Control Section of the Department of Natural Resources personnel upon request.

##### Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

## Permit Condition EU0120-002

### 10 CSR 10-6.220

#### Restriction of Emissions of Visible Air Contaminants

##### Emission Limit:

1. No owner or other person shall cause or permit to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with an opacity up to 40%.

##### Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in USEPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow.
2. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
3. The following monitoring schedule must be maintained:
  - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
  - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then;
  - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
4. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

##### Recordkeeping:

1. The permittee shall maintain records of all observation results (see Attachment D), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and
  - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain a record of any equipment malfunctions (see Attachment F).
3. The permittee shall maintain records of any USEPA Method 9 opacity test performed in accordance with this permit condition (see Attachment E).

##### Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

## Permit Condition EU0120-003

### 10 CSR 10-6.400

#### Restriction of Emission of Particulate Matter from Industrial Processes

##### Emission Limit:

1. The permittee shall not emit particulate matter in excess of 0.31 lb/hr. The emission rate was calculated using the following equation:
  - a) For process weight rates of 60,000 lb/hr or less:
$$E = 4.10(P)^{0.67}$$
Where:  
E = rate of emission in lb/hr

P = process weight rate in ton/hr

- The permittee shall not emit particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic feet of exhaust gases.

**Monitoring:**

- The paint booth shall not be operated without a fabric filter in place.
- Fabric filters shall be inspected for holes, imperfections, proper installation, or other problems that could hinder the effectiveness of the filter.
- The filters shall be inspected each shift before blasting begins and after installation of a new filter.
- The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

**Recordkeeping:**

- The permittee shall maintain records of the inspections of fabric filters when they occur.
- All inspections, corrective actions, and instrument calibrations shall be recorded.
- Attachment F contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this permit condition.
- All records shall be kept on-site for a minimum of five years and made available to Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

**EU0130 120-Gallon Parts Washer**

General Description:	120-gallon parts cleaning station used to clean mechanical parts; Parts washer uses Safety-Kleen premium solvent; Installed 1986
Manufacturer/Model #:	N/A
EIQ Reference # (2002):	EP-19

**Permit Condition EU0130-001**

**10 CSR 10-5.300**

**Control of Emissions from Solvent Metal Cleaning**

**Equipment and Operating Parameters:**

- After April 1, 2001, the permittee shall not operate a cold cleaner using a solvent with a vapor pressure greater than 1.0 mmHg at 20 degrees Celsius (20°C). Exemption: Solvent cleaning operations which meet the emission control requirements of 10 CSR 10-5.330 shall be exempt for the requirements listed above.
- The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirements listed above. The director must approve the alternative method.
- Each cold cleaner shall have a cover which will prevent the escape of solvent vapors from the solvent bath while in the closed position or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner. Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into the enclosed reservoir, except when performing maintenance or collecting solvent samples.



4. Clean parts shall be drained in the freeboard area for at least fifteen seconds or until dripping ceases, whichever is longer.
5. When the solvent volatility is greater than 0.3 psi measured at one hundred degrees Fahrenheit (100°F), and/or the solvent is agitated, and/or the solvent is heated, the design of the cover shall be such that it can be easily operated with one hand and without disturbing the solvent vapors in the tank (For covers larger than ten square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems).
6. The cold cleaner shall have a drainage facility which will be internal so that parts are enclosed under the cover while draining. If the internal drainage facility cannot fit into the cleaning system and the solvent volatility is less than 0.6 psi measured at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
7. Solvent sprays, if used, shall be a solid fluid stream (not a fine, atomized, or shower type spray) and at a pressure which does not cause splashing above or beyond the freeboard.
8. A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment.
9. If the solvent volatility is greater than 0.6 psi measured at one hundred degrees Fahrenheit (100°F) or is heated above one hundred twenty degrees Fahrenheit (120°F), then one of the following control devices must be used:
  - a) Freeboard ratio of at least 0.75;
  - b) Water cover (solvent must be insoluble in and heavier than water); or
  - c) Demonstrate an overall VOC emission reduction efficiency greater than or equal to 65% through a control system approved by the director.
10. Waste solvent shall be stored in closed containers only.
11. Any waste material removed from a cold cleaner shall be disposed of by one of the following methods or equivalent (upon approval by the Director) and in accordance with 10 CSR 10.25, as applicable:
  - a) Reduction of the waste material to less than 20% VOC solvent by distillation and disposal of the still bottom waste; or
  - b) Storage in closed containers for transfer to -
    - i) A contract reclamation service; or
    - ii) A disposal facility approved by the Director.
12. If the cold cleaner fails to perform within the operating procedures established by this rule or if solvent leaks occur within the cold cleaner, the unit shall be shut down immediately. It shall remain shut down until the operator or trained service personnel are able to restore operation within the established parameters.
13. Solvent leaks shall be repaired immediately or the degreaser shall be shut down until the leaks are repaired by the operator or trained service personnel.
14. Only persons trained in at least the operational and equipment requirements specified in this rule for their particular solvent metal cleaning process shall be permitted to operate the cold cleaner. The supervisor of the operators shall receive equal or greater operational training than the operators. Refresher training shall be given to all solvent metal cleaning equipment operators at least once every twelve months.

**Monitoring/Recordkeeping:**

1. The permittee shall monitor the throughputs of the solvents monthly and maintain material safety data sheets of the cleanup solvents used at the installation.
2. The permittee shall maintain the following records for each purchase of cold cleaner solvent (see Attachment J):
  - a) Name and address of the solvent supplier;
  - b) Date of purchase;
  - c) Type of solvent purchased; and,
  - d) Vapor pressure of solvent in mmHg at 20 degrees Celsius (20°C).
3. The permittee shall keep monthly inventory records of solvent types and amounts purchased and solvent consumed. The records shall include all types and amounts of solvent containing waste material transferred to either a contract reclamation service or to a disposal installation and all amounts distilled on the premises

(see Attachment K). The record also shall include maintenance and repair logs that occurred on the cold cleaner (see Attachment F).

4. The permittee shall keep a record of solvent metal cleaning training for each employee on an annual basis (see Attachment L).
5. All records shall be kept on-site for a minimum of five years and made available to Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

**EU0140 5-Gallon Parts Washer**

General Description:	5-gallon parts cleaning station used to clean paint spray guns
Manufacturer/Model #:	N/A
EQ Reference # (2002):	EP-19

**Permit Condition EU0140-001**

**10 CSR 10-5.300**

**Control of Emissions from Solvent Metal Cleaning**

**Equipment and Operating Parameters:**

1. The permittee shall clean spray guns used in the application of (and not limited to) primers, paint, specialty coatings, adhesives, sealers, resins and deadeners utilizing one or more of the following techniques:
  - a) Enclosed system spray gun cleaning shall consist of forcing solvent through the gun. Spray guns and nozzles only may be cleaned in remote closed top spray gun cleaning machines containing solvent-based materials capable of cleaning, provided the removable clean and spent solvent containers (not to exceed thirty gallons in size) are kept tightly closed or covered at all times except when being accessed or maintained. All remote spray gun cleaning machines shall be operated within the manufacturer's specifications. All remote closed top spray gun cleaning machines shall not be operated unless the cover is closed and shall be closed or covered when not in use;
  - b) Nonatomized cleaning shall consist of spray guns being cleaned by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. The cleaning solvent from the spray gun shall be directed into (and not limited to) a pail, bucket, drum, or other waste container that is closed when not in use;
  - c) Disassembled cleaning shall consist of spray guns being cleaned by disassembling and cleaning the components by hand in a cold cleaner, which shall remain closed at all times except when in use. Alternatively, the components shall be soaked in a cold cleaner, which shall remain closed during the soaking period and when not inserting or removing components;
  - d) Atomizing cleaning shall consist of spray guns being cleaned by forcing the cleaning solvent through the gun and directing the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions; and
  - e) Exemption: Cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems that can be programmed to spray into a closed container, shall be exempt from the above requirements.

**Monitoring/Recordkeeping:**

1. The permittee shall monitor the throughputs of the solvents monthly and maintain material safety data sheets of the
2. The permittee shall maintain the following records for each purchase of cold cleaner solvent (see Attachment J):
  - a) Name and address of the solvent supplier;
  - b) Date of purchase;
  - c) Type of solvent purchased; and,
  - d) Vapor pressure of solvent in mmHg at 20 degrees Celsius (20°C).
3. The permittee shall keep monthly inventory records of solvent types and amounts purchased and solvent consumed. The records shall include all types and amounts of solvent containing waste material transferred to either a contract reclamation service or to a disposal installation and all amounts distilled on the premises (see Attachment K). The record also shall include maintenance and repair logs that occurred on the cold cleaner (see Attachment F).
4. The permittee shall keep a record of solvent metal cleaning training for each employee on an annual basis (see Attachment L).
5. All records shall be kept on-site for a minimum of five years and made available to Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

## IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

### **10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions**

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

### **10 CSR 10-6.060 Construction Permits Required**

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

### **10 CSR 10-6.065 Operating Permits**

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

### **10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

### **10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential**

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

### **10 CSR 10-6.150 Circumvention**

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

### **10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
  - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
  - b) Paving or frequent cleaning of roads, driveways and parking lots;
  - c) Application of dust-free surfaces;
  - d) Application of water; and
  - e) Planting and maintenance of vegetative ground cover.

#### **10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

#### **10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited**

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

#### **10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Contained in State Implementation Plan)**

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

#### **10 CSR 10-5.070 Open Burning Restrictions**

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:

- a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
  - b) The schedule of burning operations;
  - c) The exact location where open burning will be used to dispose of the trade wastes;
  - d) Reasons why no method other than open burning is feasible; and
  - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt Union Pacific Railroad Company- De Soto Car Shop from the provisions of any other law, ordinance or regulation.
  - 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

#### **St. Louis City Ordinance 65645, Sec 15 Open Burning Restrictions**

- 1) No person shall cause, suffer, allow or permit the open burning of refuse.
- 2) No person shall conduct, cause or permit the conduct of a salvage operation by open burning.
- 3) No person shall conduct, cause or permit the disposal of trade waste by open burning.
- 4) No person shall cause or permit the open burning of leaves, trees or the byproducts therefrom, grass, or other vegetation.
- 5) It shall be prima-facie evidence that the person who owns or controls property on which open burning occurs, has caused or permitted said open burning.

#### **10 CSR 10-5.120 Information on Sales of Fuels to be Provided and Maintained**

Every delivery of coal or residual fuel oil when first delivered to a consumer or wholesaler in the St. Louis metropolitan area must be accompanied by a ticket prepared in triplicate and containing at least the name and address of the seller and the buyer; the grade of fuel; ash content of coal, the source of the fuel, which must be an approved source, and such other information as the Air Conservation Commission may require. One copy of each ticket shall be kept by the person delivering the fuel and be retained for one year; one copy is to be given to the recipient of the fuel to be retained for one year; and, upon request, within 30 days after delivery of the fuel, the delivering party shall mail one copy to the Air Conservation Commission.

#### **10 CSR 10-5.130 Certain Coals to be Washed**

The permittee shall not import, sell, offer for sale, expose for sale, exchange, deliver or transport for use and consumption in the St. Louis metropolitan area or use or consume in the said area any coal which as mined containing in excess of 2.0% sulfur or 12.0% ash calculated as described in 10 CSR 10-5.110, unless it has been cleaned by a process known as "washing" so that it shall contain no more than 12.0% ash on a dry basis. The term "washing" is meant to include purifying, cleaning, or removing impurities from coal by mechanical process, regardless of cleaning medium used.

#### **10 CSR 10-5.160 Control of Odors in the Ambient Air**

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

- 1) Residential, recreational, institutional, retail sales, hotel or educational premises.

- 2) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or
- 3) Premises other than those in 1. and 2 above when air containing odorous matter is diluted with four or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those exposed if fewer than 20 people are exposed. **This requirement is not federally enforceable.**

#### **10 CSR 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area**

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
- 2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

#### **10 CSR 10-6.100 Alternate Emission Limits**

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

#### **10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos**

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

#### **10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements**

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos



abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

#### **Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone**

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as

used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

#### **10 CSR 10-6.280 Compliance Monitoring Usage**

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";
    - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
  - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

## V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued,

### 10 CSR 10-6.065(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

### 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements

- 1) Recordkeeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) October 1st for monitoring which covers the January through June time period, and
    - ii) April 1st for monitoring which covers the July through December time period.
    - iii) Exception. Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
  - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
    - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

#### **10 CSR 10-6.065(6)(C)1.D Risk Management Plan Under Section 112(r)**

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

#### **10 CSR 10-6.065(6)(C)1.F Severability Clause**

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

#### **10 CSR 10-6.065(6)(C)1.G General Requirements**

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The

permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

**10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions**

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

**10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios**

None.

**10 CSR 10-6.065(6)(C)1.J Emissions Trading**

None.

**10 CSR 10-6.065(6)(C)3 Compliance Requirements**

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, as well as the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;

- b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
- c) Whether compliance was continuous or intermittent;
- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

#### **10 CSR 10-6.065(6)(C)6 Permit Shield**

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The application requirements are included and specifically identified in this permit, or
  - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
  - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
  - c) The applicable requirements of the acid rain program,
  - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
  - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

#### **10 CSR 10-6.065(6)(C)7 Emergency Provisions**

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
  - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
  - b) That the installation was being operated properly,
  - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
  - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

#### **10 CSR 10-6.065(6)(C)8 Operational Flexibility**

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

#### **10 CSR 10-6.065(6)(C)9 Off-Permit Changes**

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.

- c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
- d) The permit shield shall not apply to these changes.

#### **10 CSR 10-6.020(2)(R)12 Responsible Official**

The application utilized in the preparation of this permit was signed by Glenn Thomas, Director of Environmental Field Operations. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

#### **10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause**

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
  - a) The permit has a remaining term of less than three years;
  - b) The effective date of the requirement is later than the date on which the permit is due to expire; or
  - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

#### **10 CSR 10-6.065(6)(E)1.C Statement of Basis**

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.



## **VI. Attachments**

Attachments follow.

Draft

## Attachment A

This recordkeeping sheet or something similar may be used for the recordkeeping requirements of 10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*.

### *Fugitive Emission Observations*

[illegible]

## Attachment B

### Monthly Individual HAP Emissions Worksheet

This is an example of a form that may be used to record data required by Permit Condition PW003. The permittee must demonstrate that the facility does not emit more than 9.4 tons of any individual HAP in any consecutive twelve-month period.

This sheet covers the month of \_\_\_\_\_ in the year \_\_\_\_\_.

[illegible]

Note 1: Type of material used.

Note 2: Name of the HAP contained in the material that was used. Since this sheet is for tracking individual HAPs emission totals, all the HAPs listed in this column should be the same.

**Note 3:** Use the appropriate emission factor for the appropriate application material and method.

Note 4: The emission factors units used should correspond to the throughput units.

Note 5: Report HAP emissions in tons. For example, if Column D is in gallons and Column F is in lb/gallon then Column I = [(Column C) x (Column E)]/2000.

Note 6: Sum of HAP emissions reported in Column I.

Note 7: Running 12-month total of HAP emissions.

Note 8: HAP emissions reported for this month in the last calendar year.

Note 9: Amount reported in Note 7 minus amount reported in Note 8 plus amount reported in Note 6.  
Less than or equal to 9.4 tons indicates compliance.

## Attachment C

### Monthly Combined HAPs Emissions Worksheet

This is an example of a form that may be used to record data required by Permit Condition PW003. The permittee must demonstrate that the facility does not emit more than 24.4 tons of combined HAPs in any consecutive twelve-month period.

This sheet covers the month of \_\_\_\_\_ in the year \_\_\_\_\_.

[illegible]

Note 1: Type of material used.

Note 2: Name of the HAP contained in the material that was used.

**Note 3:** Use the appropriate emission factor for the appropriate application material and method.

Note 4: The emission factors units used should correspond to the throughput units.

Note 5: Report HAP emissions in tons. For example, if Column D is in gallons and Column F is in lb/gallon then Column I = [(Column C) x (Column E)]/2000.

Note 6: Sum of HAP emissions reported in Column I.

Note 7: Running 12-month total of combined HAP emissions.

Note 8: Combined HAP emissions reported for this month in the last calendar year.

Note 9: Amount reported in Note 7 minus amount reported in Note 8 plus amount reported in Note 6.  
Less than or equal to 24.4 tons indicates compliance.

## Attachment D

This recordkeeping sheet or something similar may be used for the recordkeeping requirements of 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*.

[illegible][illegible]

### Attachment E

This recordkeeping sheet or something similar may be used for the recordkeeping requirements of 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*.

#### Opacity Emission Observations (Method 9)

Company \_\_\_\_\_  
 Location \_\_\_\_\_  
 Date \_\_\_\_\_  
 Time \_\_\_\_\_

Observer \_\_\_\_\_  
 Observer Certification Date \_\_\_\_\_  
 Type Facility \_\_\_\_\_  
 Pt. Of Emiss. \_\_\_\_\_  
 Control Device \_\_\_\_\_

Hour	Min	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

#### SUMMARY OF AVERAGE OPACITY

Set Number	Time	Opacity	
	Start - End	Sum	Average

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.  
 The Source was/was not in compliance with \_\_\_\_\_ at the time evaluation was made.

\_\_\_\_\_  
 (Signature of Observer)

[illegible]

## Attachment G

This recordkeeping sheet or something similar may be used for the recordkeeping requirements of 10 CSR 10-5.330, *Control of Emissions from Industrial Surface Coating Operations*.

[illegible]



## Attachment H

## VOC Emission Compliance Sheet

This recordkeeping sheet or something similar may be used for the recordkeeping requirements of Permit Condition (EU0090 through EU0110)-001. For each calendar month, the permittee shall keep records, using Attachment H or an equivalent form, for each type of paint, thinner or cleanup solvent used: [\[0795-014, Special Condition 6.a\]](#)

[illegible]

## Attachment I

### VOC Emission Compliance Sheet

This recordkeeping sheet or something similar may be used for the recordkeeping requirements of Permit Condition (EU0090 through EU0110)-001.

	1	2	3	4	5	6	7	8	9	10	11	12	
Month/Year													12-Month Total (tons)
VOC Emissions (tons)													

The 12-month total VOC emissions from painting, thinners, and clean-up solvents, must less than or equal to 39.7 ton during any 12-month consecutive period to be in compliance.

Draft

## Attachment J

This recordkeeping sheet or something similar may be used for the recordkeeping requirements of 10 CSR 10-5.300, *Control of Emissions from Solvent Metal Cleaning*.

### Purchase Records for Cold Cleaning Solvent

[illegible]

## Attachment K

This recordkeeping sheet or something similar may be used for the recordkeeping requirements of 10 CSR 10-5.300, *Control of Emissions from Solvent Metal Cleaning*.

## Solvent Containing Waste

[illegible]

## Attachment L

This recordkeeping sheet or something similar may be used for the recordkeeping requirements of 10 CSR 10-5.300, *Control of Emissions from Solvent Metal Cleaning*.

## Employee Solvent Metal Cleaning Training Log

[illegible]

# STATEMENT OF BASIS

## Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Part 70 Operating Permit Application, received May 27, 2003
- 2) 2002 Emissions Inventory Questionnaire, received April 4 2003; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

## Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

### 10 CSR 10-5.040, *Use of Fuel in Hand-Fired Equipment Prohibited*

This regulation is included as a core permit requirement for all installations in the St. Louis Metropolitan area.

### 10 CSR 10-5.300, *Control of Emissions from Solvent Metal Cleaning*

This regulation has been included in the operating permit because the regulation applies to the parts washers (EU0130 and EU0140).

### 10 CSR 10-6.100, *Alternate Emission Limits*

This regulation is included as a core permit requirement for all installations in Missouri.

### 10 CSR 10-6.180, *Measurement of Emissions of Air Contaminants*

This regulation has been included in the operating permit in order to provide citing for the allowance of requests for emissions data results. On past forms issued by the Air Pollution Control Program, including the application for this permit, it was automatically marked as an administrative rule not required to be listed as an applicable requirement. It is no longer judged to be solely administrative and is, therefore, included in the operating permit.

### 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

This regulation has been included in the operating permit because the regulation applies to the shot blast operations (EU0010 through EU0030) and the painting booths (EU0040, EU0090 and EU0120). This regulation was not listed on past application forms issued by the Air Pollution Control Program, including the application for this permit.

### 10 CSR 10-6.280, *Compliance Monitoring Usage*

This regulation is included as a core permit requirement for all installations in Missouri.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter*

This regulation has been included in the operating permit because the regulation applies to the shot blast operations (EU0010 through EU0030) and the painting booths (EU0040, EU0090, and EU0120). This regulation was not listed on past application forms issued by the Air Pollution Control Program, including the application for this permit.

**Other Air Regulations Determined Not to Apply to the Operating Permit**

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-5.030, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

This regulation was listed as applicable to the Space Heaters (EP-14 and EP-16) in the permit application. Since the only indirect heating sources at the installation are the space heaters and these emission units are fueled with natural gas and do not have the potential to exceed the limitations of this regulation, this regulation was not include in the operating permit.

10 CSR 10-5.220, *Control of Petroleum Liquid Storage, Loading and Transfer*

This regulation was listed as applicable in the permit application. However, this regulation does not apply to the Gasoline Storage Tank (EP-22) because the storage tank has a capacity of less than 500 gallons. In addition, this regulation does not apply to the 1000-gallon Diesel Storage Tank (EP-2) because diesel fuel has a Reid vapor pressure of less than 4.0 psia.

10 CSR 10-5.500, *Control of Emissions from Volatile Organic Liquid Storage*

This regulation does not apply to the various volatile organic liquid (VOL) storage containers at the installation since each storage container at the installation has a capacity of less than 40,000 gallons.

10 CSR 10-5.510, *Control of Emissions of Nitrogen Oxides*

This regulation does not apply to the installation since the installation does not have the potential to emit 100 or more tons per year of NO<sub>x</sub>.

10 CSR 10-5.520, *Control of Volatile Organic Compound Emissions from Existing Major Sources*

This regulation does not apply to the installation since one or more rules under Title 10, Division 10, Chapter 5 of the CSR apply to the VOC emission from a product process.

10 CSR 10-6.260, *Restriction of Sulfur Compounds*

This regulation was listed as applicable to the Blacksmith Forge (EP-1) and space heaters (EP-14 and EP-16) in the permit application. Since these units are fired by natural gas and do not have the potential to exceed the limitations of 10 CSR 10-6.260, this regulation was not applied to these emission units.

In addition, the Drying Ovens (EU0050 and EU0100) are fired by natural gas and do not have the potential to exceed the applicable emission limitations of 10 CSR 10-6.260. Therefore, this regulation was also not applied to these emission units.

**Construction Permit Revisions**

The following revisions were made to construction permits for this installation:  
None.

### **New Source Performance Standards (NSPS) Applicability**

40 CFR Part 60, Subpart K, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978*

40 CFR Part 60, Subpart Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*

40 CFR Part 60, Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984*

These regulations do not apply to the storage vessels at the installations since the storage capacity of each of the storage vessels is less than the regulated storage capacity.

### **Maximum Available Control Technology (MACT) Applicability**

40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*

This regulation does not apply to the parts washers (EU0130 and EU0140) because these units use Safety Kleen Premium Solvent which is a nonhalogenated solvent.

40 CFR Part 63, Subpart M, *Surface Coating of Miscellaneous Metal Parts and Products*

Union Pacific Railroad Company - De Soto Car Shop has the potential to exceed the major source threshold for HAPs and be affected by Subpart M. However, the installation has voluntarily agreed to federally enforceable limitations to limit emissions of HAPs to less than 9.4 tons per year for any single HAP and/or 24.4 tons per year for combined HAPs. Operating under this condition will ensure that this installation is not a major source for HAPs and is not subject to the MACT requirements for Subpart M.

### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

40 CFR Part 61, Subpart M, *National Emission Standard for Asbestos*

This regulation applies to the installation because of the renovation and demolition parts of the subpart, which make the subpart applicable to all sources. It is included as a core permit requirement.

### **Compliance Assurance Monitoring (CAM) Applicability**

The CAM rule applies to each pollutant specific emission unit that meets all of the following:

- Be subject to an emission limitation or standard, and
- Use a control device to achieve compliance, and
- Have pre-control emissions that exceed or are equivalent to the major source threshold.

The provisions of 40 CFR Part 64 do not apply to this permit. Although potential PM<sub>10</sub> emission calculations demonstrate that EU0030 has the precontrol potential to emit greater than 100 tons per year of PM<sub>10</sub>, the facility has stated that the dust collector associated with EU0030 is an inherent part of the equipment process and is therefore not a control device. None of the other emission units with pollutant-specific emission limits and control devices has precontrol emissions that exceed or are equivalent to the major source threshold.



## Other Regulatory Determinations

### 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes*

This rule applies to the following equipment. The calculations below verify compliance for the listed emission units provided the required control devices are in operation and working properly:

#### Shot Blast Equipment (EU0010, EU0020, EU0030)

##### Emission Rate Limit (lb/hr):

$$\text{Emission Rate Limit (lb/hr)} = 4.10 (P)^{0.67}$$

P = Process Weight Rate (ton/hr)

##### Potential Controlled Emission Rate (lb/hr):

$$\text{Emission Rate (lb/hr)} = \text{Process Weight Rate (ton/hr)} * \text{PM Emission Factor (lb/1000 lb)} * (2000 \text{ lb/ton}) * (1 - \text{Control Eff}/100)$$

Emission Unit #	Associated Equipment	Process Weight Rate (ton/hr)	PM Emission Factor (lb/1000 lb)	Emission Factor Reference	Control Eff. (%)	Potential Controlled Emission Rate (lb/hr)	Emission Rate Limit (lb/hr)
EU0010	Shot Blast #1	0.65	27	AP-42 Table 13.2.6-1	99	0.35	3.07
EU0020	Shot Blast #2	0.33	27	AP-42 Table 13.2.6-1	99	0.18	1.95
EU0030	Shot Blast #3	8.92	27	AP-42 Table 13.2.6-1	99	4.82	17.76

##### Potential Controlled Emission Rate (gr/dscf):

$$\text{Emission Rate (gr/dscf)} = \text{Emission Rate (lb/hr)} * 7000 \text{ (grains/lb)} / \text{Stack Flow Rate (SCFM)} / 60 \text{ (min/hr)}$$

Flow rates converted from actual to standard conditions using the ideal gas law.

Emission Unit #	Associated Equipment	Potential Controlled Emission Rate (lb/hr)	Stack Temperature °F	Stack Flow Rate		Potential Controlled Emission Rate (gr/scf)	Emission Rate Limit (gr/scf)
				ACFM	SCFM		
EU0010	Shot Blast #1	0.35	77	32700	32152	0.0013	0.30
EU0020	Shot Blast #2	0.18	77	41500	40804	0.0005	0.30
EU0030	Shot Blast #3	4.82	77	56000	55061	0.0102	0.30

[Stack parameters obtained from EIQ]

#### Painting Operations (EU0040, EU0090, EU0120)

##### Emission Rate Limit (lb/hr):

$$\text{Emission Rate Limit (lb/hr)} = 4.10 (P)^{0.67}$$

P = Process Weight Rate (ton/hr) = MHDR (gal/hr)\*Density (lb/gal)\*(2000 lb/ton)

Potential PM Emission Rate:

$$\text{Potential Emission Rate (lb/hr)} = (\text{MHDR})(\text{EmissionFactor}) \left( 1 - \left( \frac{\text{TransferEff.}}{100} \right) \right) \left[ 1 - \left( \frac{\text{CaptureEff.}}{100} \right) \right] \left( \frac{\text{ControlEff.}}{100} \right)$$

$$\text{Emission Factor (lb/ton)} = (\% \text{ solids}/100) * 2000 (\text{lb/ton})$$

Emiss Unit #	Assoc Equip	MHDR (gal/hr)	Density (lb/gal)	Process Weight Rate (ton/hr)	Solids (%)	PM Emission Factor (lb /ton)	Transfer Rate (%)	Overall Control Eff. (%)	Potential Controlled Emission Rate (lb/hr)	Emission Rate Limit (lb/hr)
EU-0040	Old Paint Booth	26.42	9.6	0.127	41.1	822	60	99	0.42	1.03
EU-0090	New Paint Booth	26.42	9.6	0.127	41.1	822	60	90	0.42	1.03
EU-0120	North End Paint Booth	4.40	9.6	0.021	41.1	822	60	90	0.07	0.31

Emission Rate Limit (grains/dscf):

$$\text{Emission Rate (gr/dscf)} = \text{Emission Rate (lb/hr)} * 7000 (\text{grains/lb}) / \text{Stack Flow Rate (SCFM)} / 60 (\text{min/hr})$$

Flow rates converted from actual to standard conditions using the ideal gas law.

Emission Unit #	Associated Equipment	Potential Controlled Emission Rate (lb/hr)	Stack Temperature °F	Stack Flow Rate		Potential Controlled Emission Rate (gr/scf)	Emission Rate Limit (gr/scf)
				ACFM	SCFM		
EU-0040	Old Paint Booth	0.42	77	2900	2851	0.0171	0.30
EU-0090	New Paint Booth	0.42	77	72000	70793	0.0007	0.30
EU-0120	North End Paint Booth	0.07	77	17000	16715	0.0005	0.30

**Black Smith Forge**

The Black Smith Forge (EP-1) is fired by natural gas and has a total heat input of less than 10 MMBtu/hr. Although the unit may not be classified as an insignificant activity since the unit emits more than just products of combustion, it is highly unlikely that the minimal emissions from this unit would ever exceed the applicable emission limitations of 10 CSR 10-6.220, 10 CSR 10-6.260 and 10 CSR 10-6.400. It is for this reason that the APCP has determined that this unit is classified as an emission unit without limitations.

#### Space Heaters

The Space Heaters (EP-14 and EP-16) are fueled by natural gas and have a heat input of less than 10 MMBtu/hr each. These units do not have the potential to exceed the limitations of 10 CSR 10-6.220, 10 CSR 10-6.260 and 10 CSR 10-6.400. It is for this reason that the APCP has determined that these units are classified as emission units without limitations.

#### Wood Mill/Maintenance Shop

The Wood Mill/Maintenance Shop (EP-21) emits less than 0.5 lb/hr of particulate matter and is therefore, not subject to 10 CSR 10-6.400. It is for this reason that the APCP has determined that this unit is classified as an emission unit without limitations.

#### Welding Emissions

The 2002 EIQ listed EP-18 as welding emissions. In a letter dated April 23, 2004, John D. Miller, UPRR Environmental Field Operations Manager, wrote that the welding emissions are fugitive. The welding emissions are therefore not subject to 10 CSR 10-6.400. It is for this reason that the APCP has determined that this unit is classified as an emission unit without limitations.

#### Emergency Generators

The permit application listed emergency generators as insignificant activities. However, in a letter dated April 23, 2004, John D. Miller, UPRR Environmental Field Operations Manager, wrote that Union Pacific Railroad does not operate any emergency generators at the De Soto facility.

#### **Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis**

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:

---

Jason Dickneite

Environmental Engineer

CERTIFIED MAIL,  
RETURN RECEIPT REQUESTED

Mr. John Mulick  
General Director  
Union Pacific Railroad Company – DeSoto Car Shop  
491 N. Main  
DeSoto, MO 63020

Re: Union Pacific Railroad Company – DeSoto Car Shop, 099-0011  
Permit Number:

Dear Mr. Mulick:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.  
Operating Permit Unit Chief

MJS:n

Enclosures

c: Ms. Tamara Freeman, US EPA Region VII  
St. Louis Regional Office  
PAMS File: 2003-05-126

CERTIFIED MAIL, 70041160000081716152  
RETURN RECEIPT REQUESTED

Mr. John Mulick  
General Director  
Union Pacific Railroad Company – DeSoto Car Shop  
491 N. Main  
DeSoto, MO 63020

Re: Draft Part 70 Operating Permit – Project (PAMS): 2003-05-126

Dear Mr. Mulick:

The Air Pollution Control Program (APCP) has completed the preliminary review of your Part 70 (Title V) permit application. A public notice will be placed in the Jefferson County Watchman on August 7, 2006.

The APCP will accept comments regarding the draft permit that are postmarked on or before the closing date. It is very important that you read and understand this legal document. You will be held responsible for complying with this document.

Please address comments or recommendations for changes to my attention at:

Operating Permits Unit  
Air Pollution Control Program  
P.O. Box 176  
Jefferson City, MO 65102

A copy of this draft has also been sent to the U.S. EPA's Region VII office in Kansas City for their review. The Region VII office is afforded, by law, oversight authority on any Title V permit which Missouri (or any of the other states in the region) may propose to issue. A public hearing may be held if interest is expressed by the public.

Should you have any questions, or wish clarification on any items in this draft permit, please feel free to contact me at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Jason Dickneite  
Environmental Engineer

JD/kdm

Enclosures

c: PAMS File: 2003-05-126

Ms. Laurel L. Kroack, Chief, Bureau of Air  
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
PO Box 19276  
1021 North Grand Avenue East  
Springfield, IL 62702

RE: Affected States Review – Notification of Proposed Final Part 70 Operating Permit

Dear Ms. Kroack:

In accordance with Missouri State Rule 10 CSR 10-6.065(6)(F)2. and the Clean Air Act this letter is to notify you of public notice of the preliminary draft and request for comments for:

Union Pacific Railroad Company – DeSoto Car Shop located in DeSoto, MO 63020

Project Number – 2003-05-126

Public notice will be published in the Jefferson County Watchman in DeSoto, MO on August 7, 2006.

You are invited to submit any relevant information, materials, and views in support of or in opposition to the draft operating permits in writing by no later than September 6, 2006 to my attention at Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Should you require further information or documentation on this matter, please contact the Operating Permits Unit at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Thank you for your time and attention.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.  
Operating Permit Unit Chief

MJS: jdk

c: Ms. Tamara Freeman, US EPA Region VII  
St. Louis Regional Office  
PAMS File: 2003-05-126

For Publication on Monday, August 7, 2006

Notice of documents available for public viewing  
Department of Natural Resources  
Division of Environmental Quality  
Air Pollution Control Program

A draft-operating permit has been issued for the following air pollution sources:

Installation	City	Project #
Union Pacific Railroad Company – DeSoto Car Shop	DeSoto	2003-05-126

Activities included in these permits are all activities involved in the operation of these sources with the potential for producing regulated quantities of regulated air pollutants.

Copies of the draft permits are available for public comment. Public files containing copies of all non-confidential materials and a copy or summary of other materials, if any, considered in this draft permit, are available for public viewing at the following locations: MO Dept. of Natural Resources, St. Louis Regional Office, 7545 S. Lindbergh, Suite 210, St. Louis MO 63125 or by written request from the Air Pollution Control Program, Operating Permits Unit, P.O. Box 176, Jefferson City, MO 65102 (Information deemed confidential business information pursuant to Missouri State Rule 10 CSR 10-6.210, *Confidential Information*, if any exists, is not included in the public files. Emission data, as defined by this rule, cannot be considered confidential business information.)

The file is available for viewing through September 6, 2006. Citizens are invited to submit any relevant information, materials, and views in support of or in opposition to the draft operating permits in writing no later than September 6, 2006. Written comments and/or requests for public hearing should be sent to Mr. Jim Kavanaugh, Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

The Air Pollution Control Program will hold an informal public hearing after an additional 30 day comment period on the draft permit if: 1.) A timely request is made for such a hearing during the public comment period; and 2.) The person requesting the hearing identifies material issues concerning the preliminary determination and the Air Pollution Control Program determines that a public hearing will be useful in resolving those issues.

This public notice is made pursuant to Missouri State Rule 10 CSR 10-6.065, Operating Permits.

Jefferson County Watchman  
200 S. Main Street  
DeSoto, MO 63020

Attention: Legal Ads

To Whom It May Concern:

We wish to place the attached legal advertisement in your newspaper to be run ONCE. It must run on Monday, August 7, 2006,

We require a certified affidavit of publication. This must be received in our office by August 21, 2006. Please submit the affidavit and invoice for payment to:

Attention: Cheri Bechtel  
Department of Natural Resources  
Air Pollution Control Program  
P. O. Box 176  
Jefferson City, MO 65102

If you have any questions, please contact me at (573) 751-4817. Thank you for your assistance.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.  
Operating Permits Unit Chief

MJS/jdk

c: Cheri Bechtel, Procurement Clerk  
PAMS File: 2003-05-126



MISSOURI DEPARTMENT OF NATURAL RESOURCES FOLDER TRANSMITTAL ROUTING SHEET		Document #: Division Log #: Program Log #:
DEADLINE: DATE		Penalty for Missing Deadline: None
Union Pacific Railroad Company – DeSoto Car Shop		2003-05-126
Originator: Jason Dickneite		Telephone: 573-751-4817
		Date:
Typist: Karla Marshall		File Name: P:\APCP\Permits\Users\Jason Dickneite\Projects\Part 70 Renewals\Union Pacific Railroad\Union Pacific Railroad (2003-05-126) – after executive review.doc.
FOR SIGNATURE APPROVAL OF:		
<input type="checkbox"/> DNR Director <input type="checkbox"/> DNR Deputy Director <input type="checkbox"/> Division Director <input type="checkbox"/> Division Deputy Director    X Other: James L. Kavanaugh		
PROGRAM APPROVAL: Approved by: _____ Program: APCP Date: _____		
Other Program Approval (Section/Unit): _____ Date: _____		
Comments:		
ROUTE TO:		
<input type="checkbox"/> DIVISION DIRECTOR APPROVAL: _____		Date: _____
Comments:		
<input type="checkbox"/> FINANCIAL REVIEW – DIVISION OF ADMINISTRATIVE SUPPORT:		
DAS Director: _____		Date: _____
<input type="checkbox"/> Fee Worksheet Received By: _____		Date: _____
Accounting: _____		Date: _____
Budget: _____		Date: _____
General Services: _____		Date: _____
Internal Audit: _____		Date: _____
Purchasing: _____		Date: _____
Comments:		
<input type="checkbox"/> LEGAL REVIEW:		
<input type="checkbox"/> General Counsel: _____		Date: _____
<input type="checkbox"/> AGO: _____		Date: _____
Comments:		
<input type="checkbox"/> DEPARTMENT DIRECTOR APPROVAL: _____		Date: _____
Comments:		
<input type="checkbox"/> NOTARIZATION NEEDED		
		INITIALS/DATE